

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

JW ALUMINUM COMPANY,

Plaintiff,

v.

ACE American Insurance Company, Starr  
Technical Risks Agency, Inc., Westport  
Insurance Corporation, AIG Specialty  
Insurance Company, & General Security  
Indemnity Company of Arizona,

Defendants.

Civil Action No.: 2:21-cv-1034-BHH

**NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that Defendants ACE AMERICAN INSURANCE COMPANY, STARR TECHNICAL RISKS AGENCY, INC., GENERAL SECURITY INDEMNITY COMPANY OF ARIZONA, and WESTPORT INSURANCE CORPORATION (hereinafter, the “Insurers”), will move this Court, before the Honorable Bruce H. Hendricks at the United States District Court for the District of South Carolina, at the J. Waties Waring Judicial Center, 85 Broad Street, Charleston, South Carolina 29401, on a date and time designated by the Court, pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss Plaintiff JW Aluminum Company’s (“JWA”) Complaint or, in the alternative, stay proceedings and compel Plaintiff to submit to an Examination Under Oath. In support of this motion, Insurers will rely on the accompanying Memorandum of Law in Support of Motion to Dismiss and Declaration of Charles J. Rocco and exhibits thereto.

*Signature on next page*

Dated: June 24, 2021  
Charleston, SC

Respectfully submitted,

By: s/Brian C. Duffy

Brian C. Duffy, Fed Bar. No. 9491  
J. Rutledge Young, Jr., Fed. Bar No. 4432  
DUFFY & YOUNG, LLC  
96 Broad Street  
Charleston, South Carolina 29401  
(843) 720-2044 (phone)  
(843) 720-2047 (fax)  
[bduffy@duffyandyoung.com](mailto:bduffy@duffyandyoung.com)  
[jry@duffyandyoung.com](mailto:jry@duffyandyoung.com)

*Attorneys for Defendants*

*ACE American Insurance Company, Starr  
Technical Risks Agency, Inc., General Security  
Indemnity Company of Arizona, and Westport  
Insurance Corporation*